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Honorable Marc L. Barreca

FILED  
Western District of Washington  
at Seattle  
AUG 31 2012  
MARK L. HATCHER, CLERK  
OF THE BANKRUPTCY COURT

THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re

ADAM R. GROSSMAN

NO. 10-19817

STATEMENT IN OBJECTION TO  
PROPOSED ORDER ON CLAIMS:  
JILL BORODIN

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5766 27<sup>TH</sup> AVE NE  
SEATTLE, WA 98105  
646-342-1994  
BK@ADAMREEDGROSSMAN.COM

1 This claim should be denied.

2 **Counsel Should Know Better**

3 First, the claim was submitted not pro se but with the assistance of counsel who erroneously  
4 included judgments, often void, of which already half have been discarded as improper by the  
5 trustee due to the attempted inclusion of amounts after the date of conversion.

6 **Duplicated Claim**

7  
8 Second, it includes the same \$6,000 entry on the claimant's employer's claim (see related  
9 objection) which was,

- 10 1. resulting from a void judgment, that,
- 11 2. was caused by a void decree, which,
- 12 3. was requested by claimant requiring an error of law,
- 13 4. was obtained by claimant during an action in which her sworn testimony was used in  
14 support of a motion the prior court day that, "financial issues... could not be decided" and  
15 "financial matters were off the table"; and,
- 16 5. remains subject to discretionary appeal by the Washington State Supreme Court;
- 17 6. is in fact preferential payment of unsecured third party debt and not DSO;
- 18 7. includes the charging of interest or late fees during a pending bankruptcy;
- 19 8. is duplicated in its entirety by the amount in Claim #10;
- 20 9. the entire \$6,000 amount was already paid in full (see Claim #10);
- 21 10. the majority of judgments included are void resulting from enforcement void debt;
- 22 11. created by a court lacking jurisdictional; and
- 23 12. deriving from a decree which is void;
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1 13. for debt that is unenforceable to collect under state law; and,

2 14. where generally the collection of debt unenforceable under state law is illegal.

3 **Fraudulent Claim**

4 Third, the claimant continues to perpetrate fraudulent accounting potentially representing a  
5 10(b)-5 securities fraud violation that is being reported to law enforcement and was caused by  
6 the claimant and at least one other person agreeing in advance agreed in advance to engage in or  
7 causing the performance of such conduct that included making false statements known to be  
8 false by the speaker(s) at the time they were made and omitting facts or suppressing  
9 information which, in light of the circumstances under which they were made, would be  
10 necessary to make the statements not misleading, or to employ a scheme or artifice or to engage  
11 in any act, practice, or course of conduct for the purpose, intent, and goal of knowingly and  
12 willfully misrepresenting to people, or failing to inform them, of material facts upon which they  
13 relied, directly or indirectly, in connection with the purchase of sale of securities offered by the  
14 Tanager Fund LP, regulated by the SEC and filed under Regulation D §504 and §505 exempt  
15 from registration but subject to the full force and powers pursuant to The Act, as amended, with  
16 restrictions set forth therein including the use of any means or instrumentality of interstate  
17 commerce, or of the U.S. Mail, or of electronic wires across state lines, for the ultimate goal of  
18 deceiving other people, defrauding investors, and taking the property belonging to one or more  
19 people. The claimant directly and through her attorney have encouraged the trustee to adopt this  
20 fraudulent accounting which defrauds investors in the Tanager Fund LP and, ultimately, is  
21 likely to incur substantial liability to the estate.  
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1 pay expenses requested by the claimant. If the purpose then was not to keep the funds out of the  
2 claimaint's reach, by now the purpose has changed for this to now be the primary reason. The  
3 requested investigation costing \$400,000 has the ultimate result that no unsecured creditor, nor  
4 any of over eight secured creditors, will be paid even a single \$1. Any questions by any creditor  
5 about why these events were supported and requested should be directed to this claimant.  
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7  
8 Dated August 31, 2012, signed in Seattle, WA.

9 s/Adam R. Grossman/  
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